

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

MDL No. 19-2875 (RBK)

This document relates to:
All Actions

[PROPOSED] SPECIAL MASTER ORDER NO. ____

Having reviewed the Parties' agenda letters regarding the status of the meet and confers concerning Defendants' defend and indemnify agreements as well as any disputes pertaining thereto between Defendants, related to contaminated valsartan, and having heard the arguments of counsel during the April 13, 2022 status hearing, and for the reasons set forth on the record, and for good cause shown;

It is hereby ORDERED this ____ day of April, 2022 that Plaintiffs' request is **GRANTED**. By April 30, 2022, all Defendants shall complete their meet and confers with Plaintiffs, regarding the existence and status of any agreements, written or oral, to defend and/or indemnify, and any dispute, litigation, mediation, or arbitration between Defendants, related to contaminated valsartan including the claims in this litigation. Thereafter, Defendants shall disclose to Plaintiffs any

change in the status quo of such agreements, disputes, litigation, mediation, or arbitration; new demands to defend or indemnify; establishment of any new agreements; or any new dispute, litigation, mediation, or arbitration, without the need for Plaintiffs to make any further request.

Hon. Thomas I. Vanaskie (Ret.)
Special Master